



TRANSPORTATION CABINET

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May 17, 2007

Commission's Secretary
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Federal Communications Commission
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Washington, D.C. 20554

Subject: DESIGNATION OF 211 AND 511 AS ABBREVIATED DIALING CODES
CC Docket No. 92-105

The Kentucky Transportation Cabinet (KYTC) hereby submits its Reply Comments to Public Notice DA 07-2017, released May 7, 2007. The Public Notice requested comments on the status of implementation of the 211 and 511 Dialing Codes. Further, the Public Notice requested comments on actions the Commission should take if these Dialing Codes are not widely used.

The KYTC is not aware of the implementation status of 211 in Kentucky. We do know that several community service groups publicize their 211 services in local media. Our comments are therefore concentrated on the use of the 511 Dialing Code.

The KYTC was the first Agency in the United States to utilize a N11 Dialing Code (first 311, then 211) to communicate traffic information to motorists. The use of those two N11 numbers was communicated to the Commission via comments to File No. NSD-L-99-24, Docket No. 92-105, dated July 9, 1999. Geographically, this first usage covered the Kentucky portion of the Cincinnati Bell Telephone Company (CBTC) service area. After release of the 211/511 Assignment Order, CBTC and the Ohio Department of Transportation (ODOT) implemented 511 for the Ohio and Indiana portions of the CBTC service area. The KYTC and ODOT have continued the usage of 511 in the Cincinnati/Northern Kentucky Metropolitan Area. The data base has been expanded and this usage is both comprehensive and heavily used.

The KYTC has made two major expansions of its 511 service. The first expansion was to make the 511 service Statewide, including all 2,800 miles of Kentucky's National Highway System in the 511 data base. The data base for this statewide usage was a costly move on the part of the KYTC. As a cost-saving move to counter this cost, the KYTC joined with seven other States in the Condition Acquisition and Reporting System (CARS - 511) Coalition. The CARS-511 Coalition has now grown to include 10 states participating in both the CARS and 511 elements of the System.

The second major expansion was to add Premium Service Tourist Information to our data base for 42 (now 47) Counties in Southern and Eastern Kentucky. This usage has been evaluated by the University of Kentucky Transportation Center (UKTC). The UKTC has published a report entitled "Evaluation of the Eastern Kentucky Rural Highway Information Project 511 Tourism Service". This report may be accessed on-line at the following link:

http://www.itsdocs.fhwa.dot.gov/jpodocs/repts_te/14307.htm

The tourism information data base is provided by the Southern and Eastern Kentucky Tourism Development Association (SEKTDA).

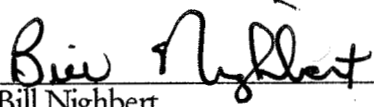
The availability of traffic and tourism information is made known in various ways. The KYTC has erected roadside signs on all routes in the CARS data base. The signs in the 47 SEKTDA Counties promote 511 for traffic and tourism information. Signs in the other 73 Counties promote traffic and travel information. In addition, SEKTDA has a carefully planned marketing program. This plan leverages publicity sponsored by tourism attractions in the 47 Counties.

Notwithstanding all of the planned marketing campaigns, Winter-time snow and ice generate far more usage of 511. During these times, radio and television news broadcasts of weather reports all include admonitions to call 511 for "More Information". On December 22-23, 2004, Kentucky had widespread snow and ice. In that month, a total of 322,835 calls were made to Kentucky 511. On just one day (December 23, 2004), a total of 136,805 511 calls were made. These numbers include calls to the 511 system serving the Cincinnati Bell Telephone Company that were not transferred to the Kentucky Statewide 511 system.

The KYTC has worked diligently to implement the 511 system in Kentucky, and has dedicated scarce road fund resources to operate and enhance the system. We respectfully request that the Commission find the public is well-served by the use of 511 for motorist information, and that the Commission continue to support the 511 Dialing Code for this purpose.

As regards the Commission facilitation of widespread use in Kentucky, there are weaknesses, particularly in rural mountainous areas, where cell phone calls are dropped. There is a portion of I-75 in Rockcastle County where most, if not all, cell phone calls are dropped. I-75 is not only important to Kentucky but to the United States as a whole, as well as to Canada. This corridor begins in South Florida, goes through Kentucky to Detroit, then onto Canadian Route 401 to Montreal and has been labeled as the "Heaviest Truck Corridor in North America". There are many other locations in Kentucky where calls are dropped but I-75 is the most important corridor. Other than the many locations where cell calls are dropped, we do not know if there are other situations in which the Commission can assist Kentucky with 511.

The Kentucky Transportation Cabinet greatly appreciates this opportunity to voice our support for an innovative method of providing traffic information to our motorists.


Bill Nighbert
Secretary of Transportation

cc: Mark David Goss, chairman
Kentucky Public Service Commission

James G. Beasley, Director
Ohio Department of Transportation